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**From:** Allison Castellan - NOAA Federal  
**To:** Wu, Jennifer  
**Sent:** 9/18/2014 8:50:50 AM  
**Subject:** Re: Pesticides Subgroup Issues Paper - 9/17 version

I only quickly skimmed but per my comments yesterday, I think we should: (1) expand the discussion of the 1998 rationale language to include the additional quotes I added to ensure managers have a good understanding of the conditional rationale language; (2) include what the original condition lang. was for add MMs for forestry per mngt request; (3) need to acknowledge that the 1998 conditional approval findings gave OR credit for meeting the basic CZARA MM and that its been NOAA/EPA policy not to revisit the 1998 decisions.

On Wed, Sep 17, 2014 at 7:52 PM, Wu, Jennifer <[Wu.Jennifer@epa.gov](mailto:Wu.Jennifer@epa.gov)> wrote:

Hi Everyone (FYI to Sheila and Elizabeth),

I've updated the CZARA pesticides issues paper to reflect information from the 1993 6217(g) CZARA guidance that describes a management measure for buffers under forest chemical management and the scientific rationale for them. I also talked with Allison this morning, and we're exploring with the attorneys and our managers whether we might clarify that in our 1998 determination, our actions should not have been "additional" management measures, but measures required by 6217(g) guidance.

Per Christine's request, we simplified the issues paper to focus more on the 6217(g) guidelines and less on FIFRA, except to be responsive to the State's assertion that FIFRA alone was adequate. Feel free to send me any comments before the meeting on Friday.

[Note to Sheila and Elizabeth: we are meeting with the subgroup on Friday, 9/19 at 10AM, then we have a managers' meeting on Monday, 9/22 at 10AM. We've been talking with many people in Oregon as well as looking at CZARA policies and communications. At this point, we're focusing CZARA on the management measure which is aerial application of herbicides on Type N streams for forests, but we're planning to write up a follow-up memo on other information we've found on how the state manages its forest chemicals.]

Thanks,

Jenny Wu

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